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17 UNITED STATES BANKRUPTCY COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 In re) Case No. 19-30088 (DM)
21 PG&E CORPORATION,)
22 and) Chapter 11
23 PACIFIC GAS AND ELECTRIC) (Lead Case–Jointly Administered)
24 COMPANY)
25 Debtors)
26 **REQUEST FOR RELIEF UPON**
27 **DEFAULT IN SUPPORT OF MOTION**
28 **FOR ORDER AUTHORIZING**
29 **WITHDRAWAL OF COUNSEL**
30 Affects:)
31 ☐ PG&E Corporation)
32 ☐ Pacific Gas & Electric Company)
33 ☒ Both Debtors) [RE: Dkt. Nos. 10160, 10161, 10162, and 10163]
34 * All papers shall be filed in the Lead)
35 Case, No. 19-30088 (DM).)
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1 no response or opposition has been filed with respect to the Motion.

2 5. A proposed order will be lodged concurrently as provided for in B.L.R. 9014-
3 1(b)(3)(A).

4 WHEREFORE, the Firm hereby requests that the Court enter the proposed order filed
5 concurrently herewith granting the Motion for the reasons set forth therein.

6 Executed on March 2, 2021.

7 GRIMSHAW LAW GROUP, P.C.

8
9 /s/ Matthew W. Grimshaw
Matthew W. Grimshaw

10 Attorneys for Robins Cloud LLP
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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2021, I caused the forgoing **REQUEST FOR RELIEF UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING WITHDRAWAL OF COUNSEL** to be electronically filed with the Clerk of the Court using the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, with the exception of Sandra Kelp.

I further certify that, on the same date, I caused the foregoing document to be sent via first-class mail, postage prepaid, to the following interested party:

Sandra Kelp
9000 Steel Canyon Road
Nampa, CA 95820

/s/ Matthew W. Grimshaw
MATTHEW W. GRIMSHAW